

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MASSACHUSETTS

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DEC 27 2005 P 240

JUDITH THIBEAU  
and GEORGE THIBEAU,  
Plaintiffs,

U.S. DISTRICT COURT  
DISTRICT OF MASS.  
Docket No. 04-10643MLW LTS

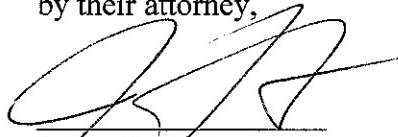
v.

UNITED STATES OF AMERICA  
and EAST BOSTON NEIGHBORHOOD  
HEALTH CENTER CORPORATION  
Defendants.

**PLAINTIFFS' MOTION TO COMPEL PRODUCTION OF WITNESS STATEMENT  
AND RESPONSE TO DOCUMENT REQUESTS**

Plaintiffs hereby move this court to compel defendant United States to immediately produce the written statement which was prepared by witness Dr. Richard Price and sent to defendant in 2003. In the alternative, plaintiffs ask that the court impose sanctions upon the defendant for its failure to produce such document. Plaintiffs further move this court for an order compelling defendant United States to immediately produce to plaintiffs formal responses to plaintiffs' first and second document requests.

Plaintiffs,  
Judith and George Thibreau,  
by their attorney,



James L. Frederick, Esq.

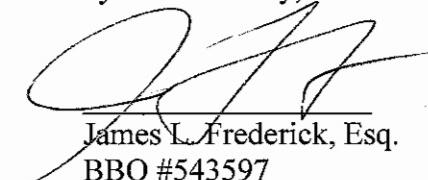
BBO #543597

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(617) 738-7880

Certificate of Compliance with Local Rule 37.1

Pursuant to Rule 37.1 (B) of the Local Rules of the United States District Court for the District of Massachusetts, defense counsel hereby states that he did confer in good faith with counsel for defendant United States in an attempt to narrow the areas of disagreement to the greatest extent possible.

Plaintiffs,  
Judith and George Thibeau,  
by their attorney,



James L. Frederick, Esq.  
BBO #543597  
Koufman & Frederick, LLP  
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**CERTIFICATE OF SERVICE**

The undersigned attorney certifies that a copy of the foregoing pleading was served upon the following attorney(s):

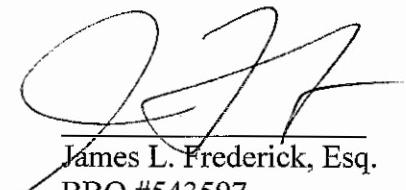
**BY HAND DELIVERY TO:**

Christopher Alberto, Esq.  
Assistant U.S. Attorney  
United States Attorney for The District of Massachusetts  
U.S. Courthouse, Suite 9200  
1 Courthouse Way  
Boston, MA 02210

**BY FIRST CLASS MAIL TO:**

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DATED: 12/27 2005



James L. Frederick, Esq.

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